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September 30, 2002

RECEIVED

SEP 30 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Docket No. MB 02-235
Ex Parte Presentations, DA 02-2082

Dear Ms. Dortch:

On behalf of Spanish Broadcasting System, Inc. ("SBS") there is transmitted herewith two copies of a bound document associated with an oral ex parte presentation made to the Commission and its staff during the week of September 16, 2002. On September 20, 2002, SBS stated that it intended to request confidentiality with regard to this document. However, upon further consideration, the entire document is herewith provided pursuant to Section 1.1206(b)(1) of the Commission's rules.

Should any questions arise with regard to this matter, kindly communicate directly with this office.

Very truly yours,

KAYE SCHOLER, LLP

By: 

Bruce A. Eisen

Enclosure

cc: Qualex International/Rm CY-B402

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An Illegal and Fraudulent Transaction

 **UNIVISION**



ENTRAVISION





CLEAR CHANNEL



Federal
Communications
Commission

SEPTEMBER, 2002

UNIVISION + NBC Public Interest Conflict

fact...  UNIVISION
+  NBC

is in **DIRECT CONFLICT** with the public interest



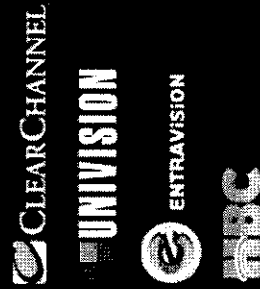
fact...

- Have intentionally lied to the Commission and conspired to control U.S. Hispanic Radio
- Have flagrantly violated Commission ownership limits



fact...











- Have misrepresented Univision's de facto control of Entravision to the Commission and conspired to control U.S. Hispanic TV

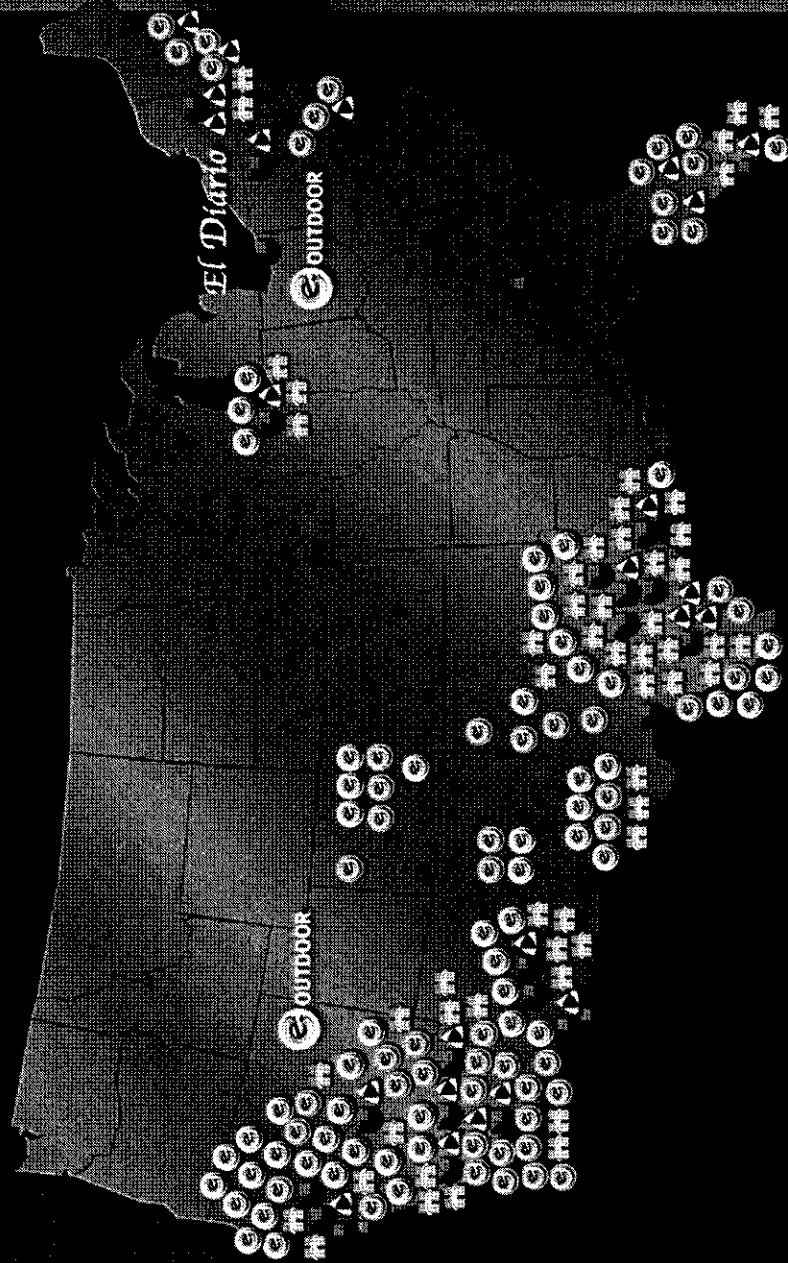


fact...

- Have intentionally lied to the Commission and conspired to control U.S. Hispanic Media
- Represents a flagrant attempt to violate Commission ownership limits

UNIVISION + NBC Resultant Control of U.S. Hispanic Media

Univision stations	
Telefuturo stations	
Cable	
Entravision stations	
Radio	
Internet	 
Billboards	
Newspaper	
Publishing	

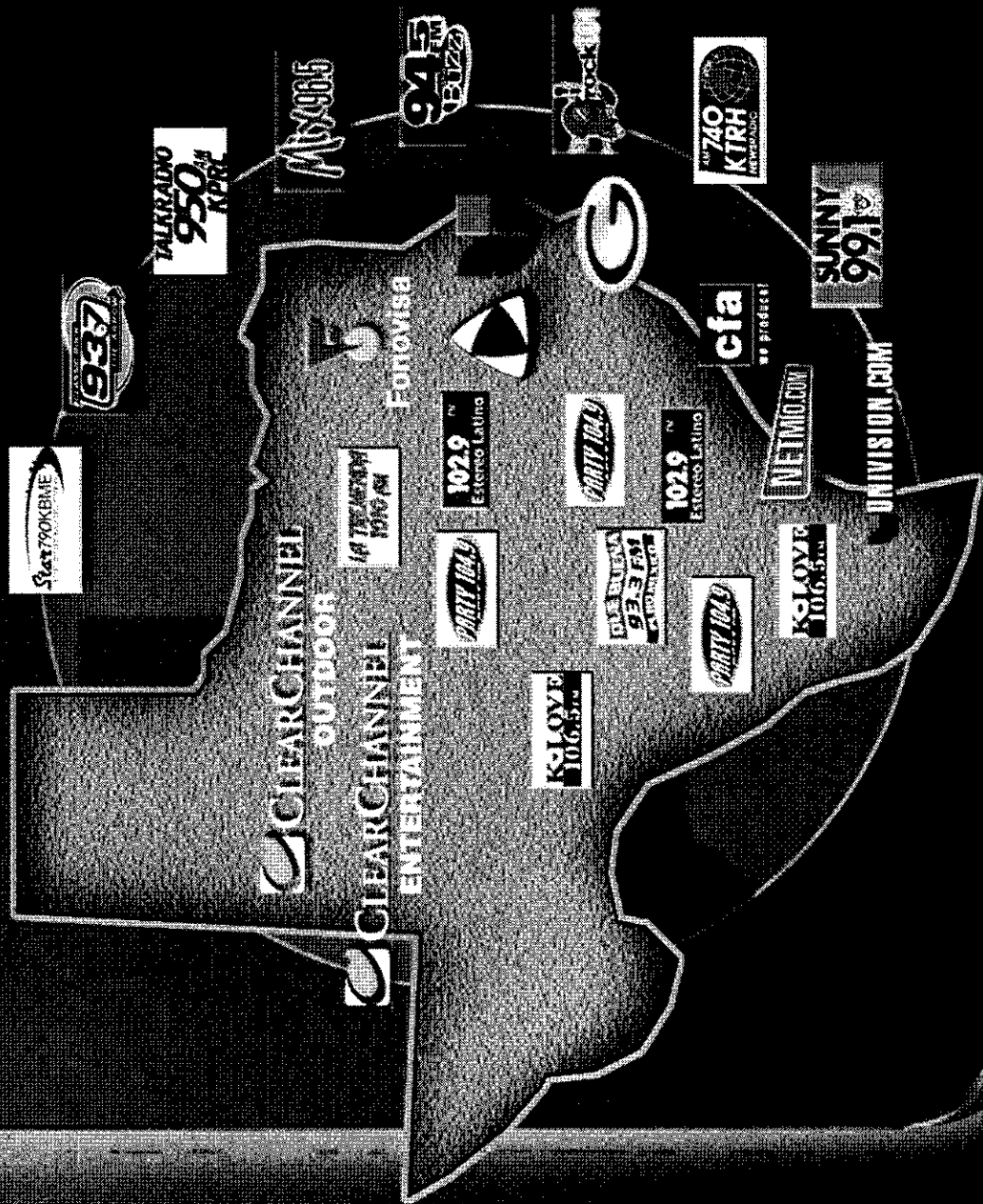


Predator Partners  **CLEARCHANNEL**  **UNIVISION**  **ENTRAVISION**

UNIVISION+MBC

(Including Entravision)

(Including Clear Channel)



Houston

2 TV Stations

9 Radio Stations

Galavision Network

Univision.com

Netmó.com

Univision Music Group

CFA Concerts

Clear Channel

- 8 Stations
- Outdoor
- Venues



Total Hispanic Broadcast Revenues

(amount in Millions)

TOP 10 MARKETS – STARTING POINT*

Market	Total TV/Radio	Univision + HBC	% of Total
Los Angeles	\$303	\$219	72%
Miami	171	95	56%
New York	122	59	48%
Houston	84	68	81%
Chicago	73	50	68%
San Francisco	64	52	82%
Dallas	62	45	71%
San Antonio	42	34	81%
San Diego	26	23	86%
El Paso	23	22	96%
Total	\$970	\$666	69%

* Excludes Telefutura and Cross Platform selling efforts

Source 2002 BIA Financial Network

T I M E L A P E

UNIVISION  ENTRAVISION

CLEAR CHANNEL  IBC

Parallel Illegal Paths to Control U.S. Hispanic Media

UNIVISION + NBC Timeline

1961

Emilio Azcárraga, Mexico's media mogul, creates Spanish International Network (SIN) - the first Spanish-language television network in the US to expand distribution of Televisa's programming.



1986
January

The FCC concludes that Televisa's control of SIN (predecessor to Univision) violates foreign ownership restrictions. US government mandates forced divestiture of SIN to Hallmark Cards.



1992



Jerry Perenchio buys Univision from Hallmark Cards. Spanish-language TV media giants - Televisa (Mexico) and Venevision (Venezuela) each receive 25% equity stake and provide exclusive programming.

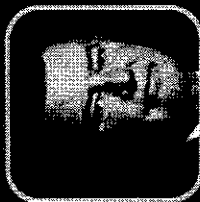
UNIVISION + HBC Timeline

1996
June 2

CC announces purchase of Hefel (HBC)

July 9

CC announces merger of HBC & Tichenor



Lowry Mays said, "We went forward with the tender offer for Hefel based on a strong belief in Spanish-language radio and the fact that we were uniquely positioned to consolidate the business. We view the merger of Hefel and Tichenor Media System as the most essential step in the process of consolidating the Spanish-language radio industry."

EXHIBIT 3

August 16

Before merger is even consummated, CC loans Tichenor \$40MM to purchase two San Francisco FM stations

EXHIBIT 4

1996
August 22

Barely 6 weeks after HBC/Tichenor merger is announced Lowry Mays and Mac Tichenor make first offer to SBS; SBS rejects offer

"It's much more rewarding to be in a position to buy the competition than to spend time changing your game plan to match theirs."

— Randall Mays

EXHIBIT 5

UNIVISION + NBC Timeline

1996
September

CC interferes with
SBS acquisition
of WYSY FM
(Chicago)

EXHIBIT
6

October



Randall Mays
tells Shrinsky
that if SBS
did not accept
CC's offer,
CC "will ultimately
buy SBS on the
bankruptcy
court steps."

EXHIBIT
1

December 23

CC misappropriates
KSCA FM (Los Angeles)
from SBS and
assigns \$10MM
option to HBC

EXHIBIT
6-7

"CC swooped in to buy
a local FM station, KSCA,
and subsequently
transferred it to
brand-new Hispanic
Broadcasting"
—Wall Street Journal
September 6, 2002

EXHIBIT
2

December

Univision invests
\$10MM, receives
option for 27.9%
interest in Entravision
Enters into 25 year
exclusive network
affiliation with
Entravision

"Univision has
significant influence
over our business."

EXHIBIT
3



CC induces
Katz to breach
representation
agreement
with SBS
Stu Olds:
"CC has never
sold a station."

EXHIBIT
9

1997

UNIVISION + NBC Timeline

1997
February 14

CC completes merger of HBC & Tichenor

Although CC claims "passive" and "non-voting" interest, certain CC Directors remain on HBC Board

EXHIBIT 10

March

Lowry Mays interferes with SBS acquisition of WXDJ/WRMA FM (Miami)

EXHIBIT 6

August 1997

CC's control of HBC is common knowledge on Wall Street
"...management and Clear Channel control both the stock and the board..."

- CS First Boston

EXHIBIT 11

1998
Early 1998

Univision opposes Liberty Media-Sony purchase of Telemundo
"It is the anticompetitive impact of Liberty Media in the role of both broadcast competitor and gatekeeper to cable television householders that particularly concerns Univision."
- Jerry Perenchio

August 18

Liberty Media and Sony close on Telemundo acquisition

UNIVISION + NBC Timeline

1999

April 28

In his own words, HBC Chairman (and supposed controlling shareholder) Mac Tichenor refers to CC's consolidation of Hispanic radio at Phoenix conference:

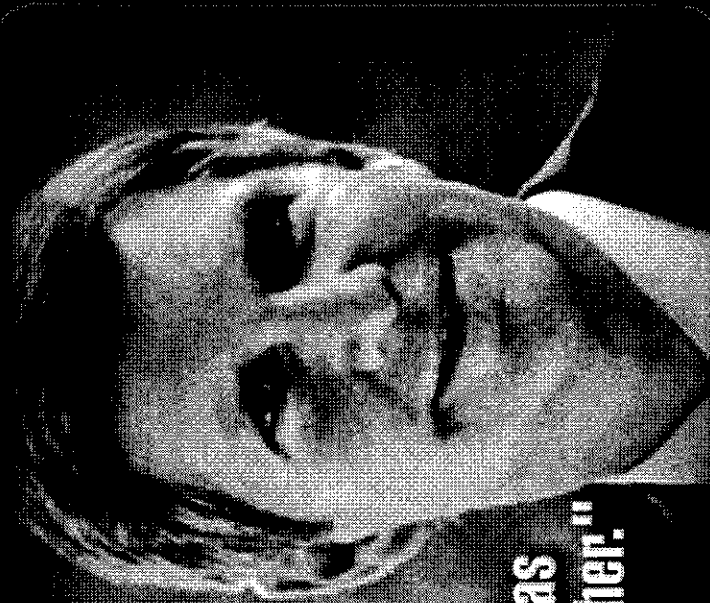
EXHIBIT 12

May

June

July

1999



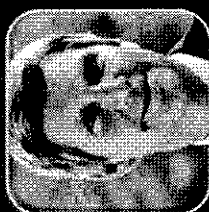
"It's been a pleasure... growing the company from that kind of base that Clear Channel was able to put together."

UNIVISION + HBC Timeline

1999

1999

April 28



In his own words, HBC Chairman (and supposed controlling shareholder) Mac Tichenor refers to CC's consolidation of Hispanic radio at Phoenix conference:



EXHIBIT 12

May

SBS engages Lehman Bros. to explore IPO option

EXHIBIT 13

June

Randall Mays of Clear Channel attempts to derail SBS's upcoming IPO by calling Lehman Bros.: "Alarcón is a drug trafficker" After first saying this is "false" CC attorney Steve Susman then admits Mays "probably called" Lehman Bros.

EXHIBIT 1, 2 & 14

July

SBS selects IPO syndicate Lehman Bros. Merrill Lynch CIBC BT Alex Brown

EXHIBIT 15

UNIVISION + HBC Timeline

1099
August

<p>August 13</p> <p>Alarcón complains to CC/HBC: "Clear Channel's active involvement in HBC efforts to derail our initial public offering - apart from violating FCC passive investment regulations - constitutes a conspiracy to restrain trade in violation of federal and state antitrust law."</p> <p>Raúl Alarcón Letter to CC & HBC</p> <p>EXHIBIT 16</p>	<p>August 13</p> <p>Alarcón complains to CC/HBC: "Clear Channel's active involvement in HBC efforts to derail our initial public offering - apart from violating FCC passive investment regulations - constitutes a conspiracy to restrain trade in violation of federal and state antitrust law."</p> <p>Raúl Alarcón Letter to CC & HBC</p> <p>EXHIBIT 17</p>	<p>Late 1999</p> <p>Mega Communications attempts to purchase TV stations from Latin Communications Group. Univision EVP Andrew Hobson informs Mega not to bother "programming affiliation will be canceled".</p> <p>EXHIBIT 18</p>	<p>December 23</p> <p>SBS submits arguments to DOJ against CC's continued ownership of HBC in light of CC/AMFM merger</p> <p>EXHIBIT 19</p>	<p>December 20</p> <p>In a direct edict from Jerry Perenchio, Univision begins policy of refusing to accept advertising from Internet portals until it develops and launches its own web subsidiary.</p> <p>The decision sparks charges of monopoly and private censorship.</p> <p>"If Microsoft was doing it, they would be in front of a judge right now."</p> <p>- Carl Kravetz</p> <p>Cruz/Kravetz Ideas leading US Hispanic ad agency</p> <p>EXHIBIT 20</p>
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UNIVISION+HBC Timeline

2000
Jan 10

March

Univision invests additional \$110MM in Entravision to partially fund Latin Communications Group acquisition, increases option to 40% ownership

NHPJ (National Hispanic Policy Institute) files FCC Petition to Deny CC/AMFM merger due to CC's illegal control of HBC

EXHIBIT 21

June 19

DOJ blocks CC's attempt to divest stations to HBC

EXHIBIT 22

June

Lehman hires broadcast analyst Bill Meyers; HBC threatens to withhold access to Meyers due to Lehman's relationship with SBS

EXHIBIT 23

July 11

A group of House members urge DOJ review of CC/HBC relationship "Clearly, a thorough review of Clear Channel's holdings and influence over Hispanic Broadcasting should be pursued..."

EXHIBIT 24

2000

UNIVISION+ABC Timeline

2000
August 30

CC completes acquisition of AMFM including Katz Media Stu Olds promoted to "CC's Circle of Power"

EXHIBIT 25

• On average, CC has purchased 4 radio stations and 2,000 billboards a week—continuously—for more than 8 years

EXHIBIT 5

September

Univision.com launched and immediately becomes #1 Hispanic web site

EXHIBIT 26

Sept. 19

Televisa announces merger of its Mexican radio group, Radiopolis, with Grupo Acir, a Clear Channel subsidiary

Dec. 4

Mexico's Federal Competition Commission denies proposed radio merger, (Televisa/CC) contending that it would squeeze smaller competitors out of the advertising market and give Televisa unacceptable dominance in the Mexican radio market

EXHIBIT 27

Dec. 7

Univision acquires USA TV Network from Barry Diller for \$1.1 Billion as a blocking move to prevent TV Azteca-Pappas from launching Hispanic TV competitor in US

EXHIBIT 28

UNIVISION + HBC Timeline

2001
April 4

HBC makes second offer to SBS; SBS declines

EXHIBIT 29

May

In retaliation for SBS' refusal of HBC's offer, HBC induces investors to dump SBS shares

SBS

share price plummets

HBC

share price increases 58%

EXHIBIT 1

July

HBC COO attempts to hire SBS VP of Programming and GM of Los Angeles

EXHIBIT 30

September

Univision forces Entravision radio stations in Denver to drop Telemundo advertising

EXHIBIT 31

2001

UNIVISION+HBC Timeline

2002
January

January 25

CC directs its Hispanic entertainment subsidiary to work with HBC

EXHIBIT 32

HBC CFO Jeff Hinson tortiously interferes with SBS's KFSG FM acquisition

EXHIBIT 33

February 8

Once again, Alarcón contacts Mays and Tichenor re: antitrust claims dating back to 1996

EXHIBIT 34

March 25

SBS secures \$1 Billion credit facility and makes first settlement offer to HBC

EXHIBIT 35

April 17

Alarcón contacts Lowry Mays re: offer to HBC "This transaction, in my opinion, is the clearly desirable alternative to the resolution of our differences and fully addresses the best interests of the shareholders of CC, HBC, & SBS"

EXHIBIT 36

April 18

Mays replies to Alarcón "I have great confidence that HBC will consider any offer that it feels will enhance shareholder value for the equity holders... As you know, Clear Channel is a passive investor and can have no voice in this decision until and unless it is brought to us for a vote."

EXHIBIT 37

- Lowry Mays

UNIVISION+ABC Timeline

2002
May 11

SBS terminates network affiliation with CC and launches "Party 92.7" in San Francisco, an indirect competitor to CC's KYLD FM

May 15

In retaliation CC personnel deface SBS Oakland office and studios

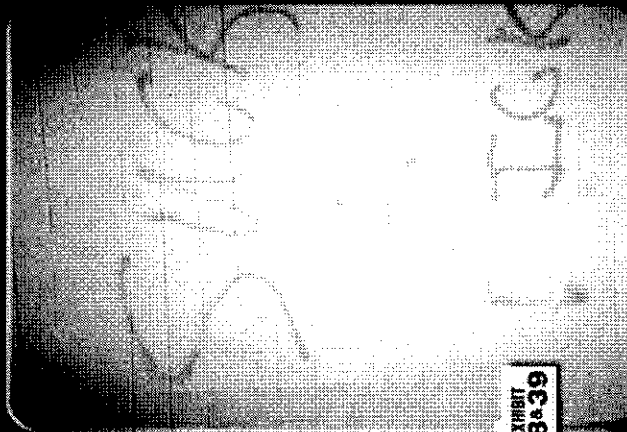


EXHIBIT
38 & 39

May 22

SBS increases credit facility to \$1.2 Billion and makes second settlement offer to HBC

May 24

Univision and HBC sign confidentiality agreement

UNIVISION+HBC Timeline

Alarcón's repeated attempts to contact Tichenor fail

2002

May 31

June 3

June 4

June 5

June 11

June 12

June 13

June 14

Tichenor

assures Alarcón
"My plan is to get
back to you shortly
thereafter (June 4th
board meeting)
with a clear sense
of what we will be
willing to do, and a
proposed timeline
that would include,
with your concurrence,
a presentation by you
to my board."

EXHIBIT 40

No further word is
ever heard from
HBC or CC

Alarcón

unsuccessfully
attempts to
contact
Jerry
Perenchio

Drew Marcus
tells Alarcón
at Deutsche
Bank Media
Conference
that initiating
SBS research
coverage
"has been
political."

Alarcón

contacts
Univision
Vice Chairman
Bob Cahill
who denies
Univision/HBC
transaction

Lowry Mays

Mac Tichenor
Jerry Perenchio
Sign voting
agreement
Mays' controlling
velo irrevocably
supports
Univision bid

EXHIBIT 41

8:30 am

Univision
announces
acquisition
of HBC
"We look to
strengthen and
consolidate
our market
leadership
to create a
media group
with an
unequalled position in the
US Hispanic community"

EXHIBIT 42

10:25 am
SBS announces antitrust
complaint against CC/HBC

Univision

informs
N.Y. events
promoter that
TV promotional
contract
cannot
include SBS
due to
Univision
acquisition
of HBC

EXHIBIT 43

Univision
informs
SBS L.A.
personnel
that only
HBC
personnel
allowed
on Univision

EXHIBIT 44

Lowry Mays (Clear Channel) sells HBC to Jerry Perenchio (Univision)
Bel Air, California

UNIVISION + NBC Timeline

2002
June 27

In response to multiple industry complaints against CC, Senator Russ Feingold introduces legislation re: radio/concerts antitrust

July 10

July 10

July 15

July 22

July 26

2002
August 3



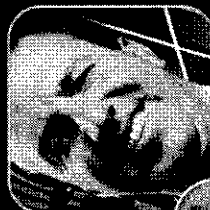
"With regard to the Feingold legislation, that's basically legislation that isn't going anywhere... I think if you're talking to anyone in the Washington circles, they don't give it a prayer of getting on the docket."

— Mark Mays

UNIVISION + HBC Timeline

2002
June 27

In response to multiple industry complaints against CC, Senator Russ Feingold introduces legislation re: radio/concerts antitrust



July 10

FCC commences hearings on various CC radio acquisitions due to competitive concerns

EXHIBIT 45

July 10

Univision introduces platform selling #1 TV #1 Radio #1 Records #1 Cable #1 Online concept to 12 major Hispanic agencies - New York City

EXHIBIT 46

July 15

Petition to Deny supplement filed at FCC alleging CC control of various radio "fronts" including Secret Communications, Concord Media Group, Youngstown Radio, Chase Radio and HBC

Petition documents co-mingling of HBC and CC personnel

EXHIBIT 47

2002
August 3

Univision and HBC produce first entertainment joint venture at Dodger Stadium, Los Angeles

UNIVISION + HBC Timeline

2002

August 26

Sept. 3

Sept. 5

Sept. 6

Sept. 12

Sept.

FCC announces waiver of ex parte contact in Univision/HBC proceeding

EXHIBIT 48

NHPI and others file FCC Petitions to Deny Univision transaction
"The applications for consent to transfer of control are sham applications structured to comply, on paper, with the FCC's multiple ownership rules"

EXHIBIT 49

FCC commences additional hearings on CC acquisitions due to competitive concerns

EXHIBIT 51

"If the Univision deal goes through, Spanish Broadcasting's very survival could be at stake"
—Wall Street Journal
CC admits its illegal relationship with HBC:
"The rules do not include a general prohibition on the companies helping each other out if each decides that is in its best interests"
—Steven Susman
CC Counsel

EXHIBIT 2

DOJ issues "second request" to Univision and HBC
Legitimate concerns regarding the transaction's negative impact have been raised

EXHIBIT 50

US Congressional Hispanic Caucus to commence review of Univision/HBC transaction

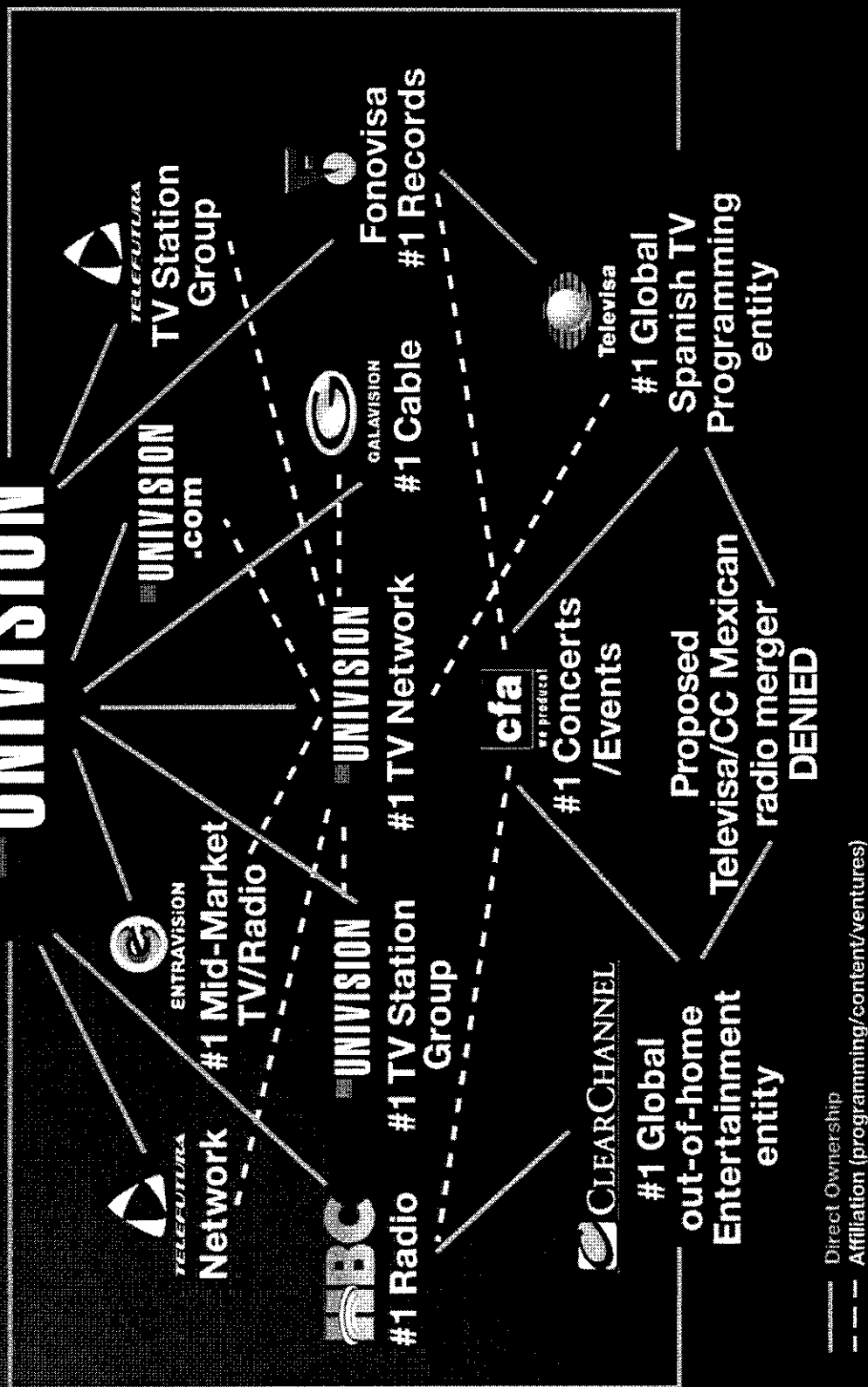
EXHIBIT 52

Structural Nexus

Jerry Perenchio

Jerry Perenchio

UNIVERSITY



Univision
#1 TV Group(s)
#1 Network(s)
#1 Radio
#1 Records
#1 Cable
#1 Online

Economic dominance
of Univision Group
expansion of Univision assets
inhibits competitors

Stronger
#1 Univision Group
economic clout

Univision
Radio + TV, Records, Online
commands higher
rates

Stronger #1 Univision
Online

Univision Radio, TV and Records
feed Univision Online
excludes competitors

Stronger #1 Univision
Records

Univision Radio + TV favors
Univision Records
excludes competitors

Stronger #1 Univision
Radio

Massive promotion of
Univision Radio
excludes competitors

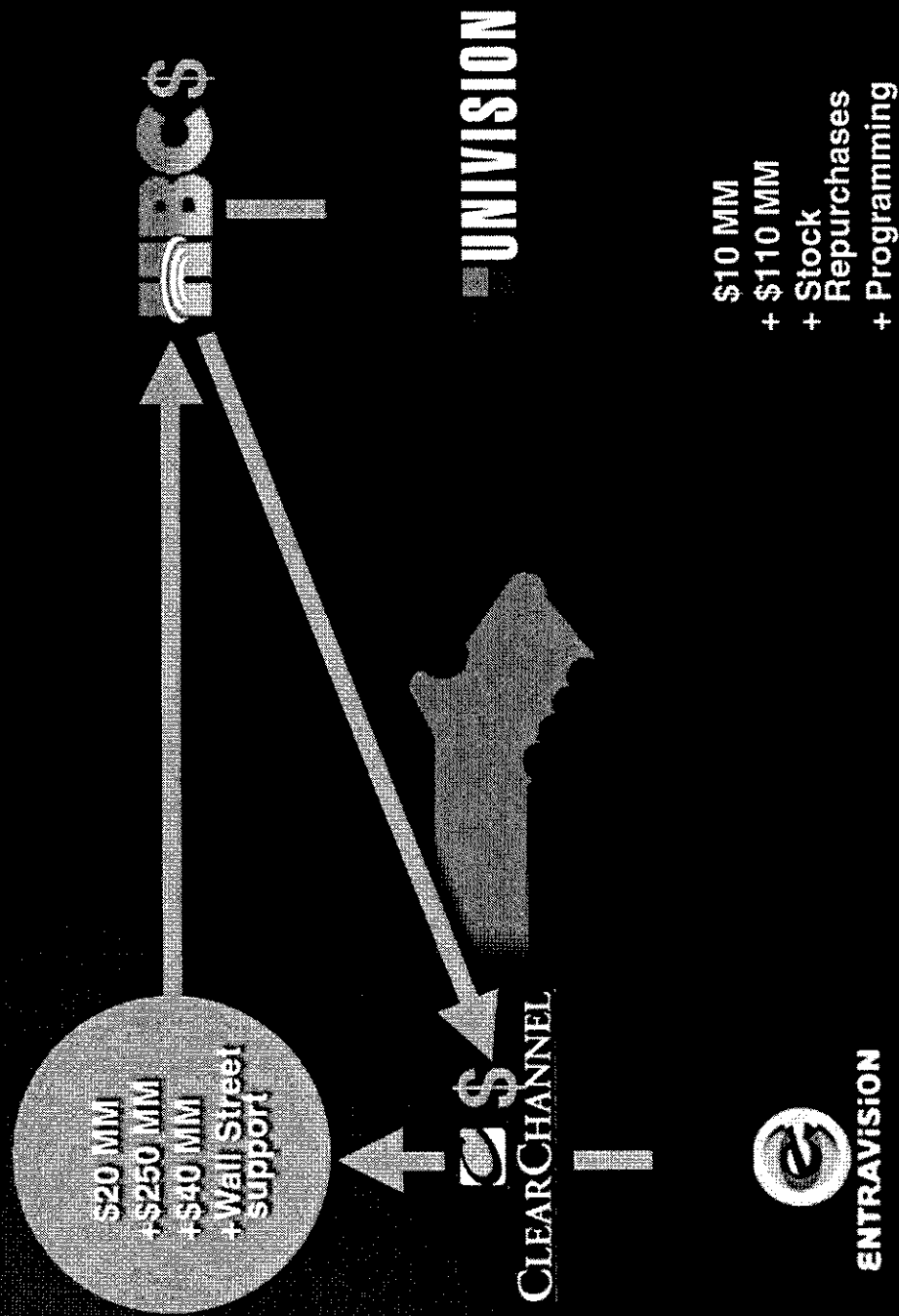
Stronger #1 Univision
TV + Cable

Lack of competitive
TV programming
(15 years remaining)
excludes competitors

UNIVISION'S Illegal Self-Perpetuating Monopolistic Model

This Anticompetitive Cycle cannot be broken. There is no weak link.

UNIVISION + HBC The Money Trail



Sham Checklist

FCC SHAM FILINGS

MARKETPLACE REALITIES

Clear Channel does not control HBC	Clear Channel created HBC Clear Channel funded HBC Clear Channel assisted/directed HBC Clear Channel "dealt" HBC to Univision – Bel Air, CA May 2002 Clear Channel illegally tried to derail HBC competitor SBS
Clear Channel has "non-voting" stock in HBC	Clear Channel's 26% "non-voting" HBC stake is actually much more determinative than if 26% were actually voting: HBC cannot make a single major corporate act without Clear Channel approval (negative control)
Clear Channel has no HBC board representation	To this day, HBC board has directors originally named by Clear Channel prior to adoption of "non-voting" scam
Clear Channel is a "passive" HBC investor	Clear Channel employees work at HBC stations; Clear Channel has attempted to acquire or eliminate HBC's competitors.

Sham Checklist

FCC SHAM FILINGS

MARKETPLACE REALITIES

Univision does not control Entravision	Univision created Entravision Univision funded Entravision Univision repurchased Entravision shares in open market Univision controls programming = lifeblood of Entravision
Univision and Entravision are "independent" competitive entities	Univision blocked Entravision competitor from acquiring TV stations in Tampa, Orlando and Washington, D.C.
Univision is not involved in Entravision operations	Univision blocked competitor Telemundo from advertising on Entravision radio stations in Denver
Univision is not a monopolist	Univision denied access to its TV network to all internet portals in order to provide exclusivity to Univision.com
Univision has proposed non-voting stock and removal of directors from Entravision board	Univision retains 31% ownership Univision retains programming lifeblood Univision non-voting sham = Clear Channel non-voting sham



Public Interest Considerations

fact...

Government Regulators and Oversight Agencies have given Predators every "benefit of the doubt" in approving past transactions

Predators have proven themselves untrustworthy

fact...

Non-voting stock
Stock trusts
Non-attributable equity stakes
Veto rights
Passive minority interests

Have not worked in the marketplace



Public Interest Considerations

fact...

**The Public Interest
Will Not Be Served
By Univision/HBC**

**Impermissible, dominant
monopolistic market share**

Elimination of voices

Economic concentration

Reduction of competitive choices

**Foreclosure (forever) minority
ownership of media**

Univision + HBC \neq Public Interest

1+1=1

UNIVISION + HBC

Public Interest Considerations

fact...

UNIVISION HBC CLEAR CHANNEL  ENTRAVISION

Lied to the Commission regarding their true influence and control of "non-attributable" related entities

Predators have abused the power derived from public airwaves to commit illegal acts

Are now seeking regulatory approval once again of their conspiratorial control of U.S. Hispanic Media

If allowed to join forces, Predators will unavoidably self-perpetuate by inhibiting free-market competition



Recommendations

The proposed acquisition of HBC by Univision should be **DENIED** as it will create an irreversible negative impact inconsistent with the public interest.

The Perenchio, Clear Channel, Tichenor voting agreement should be voided as it violates the Communications Act.

Since June 1996 the Clear Channel stake in HBC has been illegal and attributable.

The Commission should designate both licensees for hearing.

Since December 1996 Univision has misrepresented its control of Entravision. Univision now proposes to use Clear Channel's sham ownership structure to control U.S. Hispanic media. The Commission should designate both licensees for hearing.

UNIVISION + HBC An Illegal and Fraudulent Transaction

Supporting Documentation • Witnesses • Affidavits

EXHIBIT 1 SBS vs. Clear Channel and HBC Amended Complaint

EXHIBIT 2 Wall Street Journal - September 6, 2002

EXHIBIT 3 Hefftel Broadcasting SEC filing dated July 11, 1996

EXHIBIT 4 Hefftel Broadcasting SEC filing dated January 14, 1997

EXHIBIT 5 Selected quotes from "IT'S NOT THE BIG THAT EAT THE SMALL, IT'S THE FAST THAT EAT THE SLOW" by Jason Jennings and Laurence Haughton

EXHIBIT 6 Raúl Alarcón affidavit to DOJ dated November 19, 1996

EXHIBIT 7 Correspondence related to KSCA FM transaction

EXHIBIT 8 Entravision SEC filing dated March 26, 2002

EXHIBIT 9 Correspondence related to Katz termination

EXHIBIT 10 Filings related to Clear Channel appointees to HBC Board

EXHIBIT 11 CSFB Research Report, circa August 1997

EXHIBIT 12 Audio Recording - McHenry Tichenor, Jr. comments at Radio Conference Phoenix, Arizona - April 28, 1999

EXHIBIT 13 SBS engagement letter with Lehman Brothers

EXHIBIT 14 Witness: Juan A. Garcia, former V.P., Lehman Brothers

EXHIBIT 15 BT Alex Brown presentation

EXHIBIT 16 Witness: Joseph A. Garcia, CFO, Spanish Broadcasting System

EXHIBIT 17 Letter from Raúl Alarcón to Lowry Mays and McHenry Tichenor, Jr. dated August 13, 1999

UNIVISION + NBC An Illegal and Fraudulent Transaction

Supporting Documentation • Witnesses • Affidavits

EXHIBIT
18

Witness: Alfredo Alonso,
President, Mega Communications

EXHIBIT
19

SBS "White Paper" submitted to Department
of Justice dated December 23, 1999

EXHIBIT
20

Excerpt from Hispanic Business article
dated May, 2000

EXHIBIT
21

National Hispanic Policy Institute FCC
Petition to Deny dated January 10, 2000

EXHIBIT
22

Hispanic Market Weekly article
dated June 19, 2000

EXHIBIT
23

Witness: William Meyers,
Analyst, Lehman Brothers

EXHIBIT
24

Letters from Members of Congress
to the DOJ/FCC dated July 11, 2000

EXHIBIT
25

Print ad of Clear Channel's "Circle of Power"
members including Stu Olds of Katz Media

EXHIBIT
26

Univision Press Release

EXHIBIT
27

Press coverage of Televisa/Clear Channel
transaction

EXHIBIT
28

Univision SEC filing dated June 26, 2001

EXHIBIT
29

HBC merger offer to SBS dated April 4, 2001

EXHIBIT
30

Witness: William Tanner,
V.P. of Programming,
Spanish Broadcasting System

EXHIBIT
31

Witness: Mirta de Armas,
Media Manager, Telemundo

EXHIBIT
32

E-mail correspondence from
Randy George to Raúl Alarcón

EXHIBIT
33

Congressman Berman's Press Release and
Letter to DOJ/FCC dated January 22, 2002

UNIVISION + HBC An Illegal and Fraudulent Transaction

Supporting Documentation • Witnesses • Affidavits

- EXHIBIT 34** Correspondence from Raúl Alarcón to Lowry Mays and McHenry Tichenor, Jr. dated February 8, 2002
- EXHIBIT 35** SBS settlement offer to HBC dated March 25, 2002
- EXHIBIT 36** Correspondence from Raúl Alarcón to Lowry Mays dated April 17, 2002
- EXHIBIT 37** Correspondence from Lowry Mays to Raúl Alarcón dated April 18, 2002
- EXHIBIT 38** Photographs of SBS Oakland facilities after being vandalized by Clear Channel personnel on May 16, 2002
- EXHIBIT 39** Oakland Police Report
- EXHIBIT 40** Correspondence from McHenry Tichenor, Jr. to Raúl Alarcón dated May 31, 2002
- EXHIBIT 41** Voting agreement by and between Perenchio, Clear Channel and Tichenor family
- EXHIBIT 42** Univision press release dated June 12, 2002
- EXHIBIT 43** Witness: Felix Cabrera, President, FC Latino Music Corp.
- EXHIBIT 44** E-mail correspondence of Juan Carlos Hidalgo
- EXHIBIT 45** FCC Designation of Hearing Orders dated July 10, 2002
- EXHIBIT 46** Witness: Manuel Machado, President/CEO, BVK Meka
- EXHIBIT 47** Supplement of Petition to Deny filed by David Ringer dated July 15, 2002
- EXHIBIT 48** FCC press release
- EXHIBIT 49** National Hispanic Policy Institute FCC Petition to Deny dated September 3, 2002
- EXHIBIT 50** Univision press release regarding DOJ "second request" dated September 12, 2002
- EXHIBIT 51** FCC Designation of Hearing Order dated September 5, 2002
- EXHIBIT 52** Correspondence from Congressman Robert Menendez to FCC Chairman Powell dated September 17, 2002
- EXHIBIT 53** FCC report "Whose Spectrum is it Anyway?" dated December, 2000
- EXHIBIT 54** Univision, HBC, Clear Channel and Entravision media holdings in selected markets
- EXHIBIT 55** Hypothetical Cross-Platform Ad Negotiation